

UNITED STATES DISTRICT COURT

for the

District of South Carolina

Chong, Cheynne

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Dynamic Recovery Solutions LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) Yes No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Cheynne Chong
Street Address	618 S. Del Mar Ave.
City and County	San Gabriel, San Gabriel Valley
State and Zip Code	California, 91776
Telephone Number	626-831-1148
E-mail Address	cheynnechong@icloud.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	Dynamic Recovery Solutions LLC
Job or Title <i>(if known)</i>	N/A
Street Address	135 Interstate Blvd.
City and County	Greenville & Greenville County
State and Zip Code	South Carolina & 29615
Telephone Number	800-313-2768
E-mail Address <i>(if known)</i>	customerservice@gotodrs.com

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)***II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

15 U.S. Code 1692f (8)

15 U.S. Code 1692b (5)

15 U.S. Code 1692b (2)

15 U.S. Code 1666d (c)

15 U.S. Code 1605 (a)

15 U.S. Code 1692e (2) (a)

15 U.S. Code 1692f (1)

15 U.S. Code 1692d (2)

15 U.S. Code 1692c

FDCPA Section 811 (A) (2)

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**The plaintiff, *(name)*, is a citizen of
the

State of *(name)*

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated
under the laws of the State of *(name)*,
and has its principal place of business in the State of *(name)*

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)*, is a citizen of
the State of *(name)*. Or is a citizen of
(foreign
nation)

b. If the defendant is a corporation

The defendant, *(name)*, is incorporated
under
the laws of the State of *(name)*, and has its
principal place of business in the State of *(name)*.
Or is incorporated under the laws of *(foreign nation)*,
and has its principal place of business in *(name)*.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- 1) Defendant introduced fraud by attempting to collect on debts not previously owed. The defendant also introduced fraud by purchasing and holding personal information without entering into agreement or contract with Plaintiff. Defendant has failed to respond to all affidavits and notices of claims that were sent certified mail via the United States Postal Service.
- 2) Defendant was provided the opportunity to state a claim or to remain silent and to agree with all terms set forth in the unresponded, un rebutted certified Notice of Liability, Notice of Fault and Opportunity to Cure and the Notice of Default and Imminent Liability, which included a Request for Admissions and a True Bill containing said violations. (exhibits are attached for the record)

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff is asking the court to order Dynamic Recovery Services LLC to cease communications with plaintiff due to violations of 15 U.S. Code 1692e(3).

Plaintiff is asking court to order relief due to the discovery of fraud, and providing the opportunity for defendant to state a claim or remain silent to which the Defendant, Dynamic Recovery Services LLC, has remained silent in not responding to certified claims. Plaintiff is asking the court to order that as a result of the discovery of fraud, and violations under U.S. Code under Title 15 and a violation under FDCPA Section 811.

Plaintiff is asking the court to order the defendant to remit ten thousand united states dollars (10,000) to plaintiff per:

- 15 U.S. Code 1692f (8) - one thousand dollars
- 15 U.S. Code 1692b (5) - one thousand dollars
- 15 U.S. Code 1692b (2) - one thousand dollars
- 15 U.S. Code 1666d (c) - one thousand dollars
- 15 U.S. Code 1605 (a) - one thousand dollars
- 15 U.S. Code 1692e (2) (a) - one thousand dollars
- 15 U.S. Code 1692f (1) - one thousand dollars
- 15 U.S. Code 1692d (2) - one thousand dollars
- 15 U.S. Code 1692c - one thousand dollars
- FDCPA Section 811 (A) (2) - one thousand dollars

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/17/2023

Signature of Plaintiff

Printed Name of Plaintiff Cheynne Chong

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address